

ENTERED

September 06, 2019

David J. Bradley, Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

M.D., b/n/f Sarah R. Stukenberg, et al.,)

Plaintiffs,)

v.)

GREG ABBOTT, in his official capacity)
as Governor of the State of Texas, et al.,)

Defendants.)

Civil Action No. 2:11-CV-00084

CONFIDENTIALITY ORDER

After due consideration of the parties' request for an order to govern disclosure and access to confidential information, as well as treatment and maintenance of confidential information by the Court-appointed Monitors and their staff (collectively, "Monitors"), and finding that good cause exists to enter a confidentiality order, it is Ordered as follows:

1. The following documents and information are deemed "Confidential Information" and be governed by this Confidentiality Order: All information supplied in any form about the individual class members, family members, or persons who receive services from the defendants, including files, documents, reports, records, communications, working papers used or developed in an investigation of suspected child abuse or neglect or in providing services as a result of an investigation, electronic information, images (whether photographs or videos), as well as any information received from another agency, division, or person if that information is Confidential Information and may not be disclosed except as provided by this Confidentiality Order.

2. No person will receive access to Confidential Information prior to signing the Acknowledgment annexed as Exhibit A. Confidential information will be used solely for the purpose of proceedings in connection with this action. The monitors and the monitors' staff shall not disclose information about the individual class members, family members, or persons who receive services from the defendants in an identifying way, and are subject to the protective order in this case.

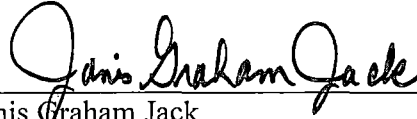
3. All persons with access to Confidential Information will protect that information by safeguarding any username, password, or other authorization that allows them to access Confidential Information. They shall take precautions to avoid misusing or mishandling Confidential Information, including encrypting such information when transmitting it via email or on a portable storage device. They shall not copy, sell, loan, alter or destroy any Confidential Information.

4. The Monitors or the parties may submit Confidential Information to the court provided that any court filings or reports to the court containing Confidential Information, including the attachment of Confidential Information as an exhibit to a filing or report, be filed under seal. The Monitors and the parties shall assure that any publicly available court filing they submit does not reflect Confidential Information. Publicly available court filings containing data

derived from Confidential Information will reflect such data without reference to individually identifiable information.

5. All parties shall receive a signed copy of Exhibit A prior to the disbursal of Confidential Information to the signatory.

Signed and Ordered on this 6th day of September, 2019.

A handwritten signature in black ink, reading "Janis Graham Jack", written over a horizontal line.


Janis Graham Jack
Senior United States District Judge

EXHIBIT A
Acknowledgment

I, Ashley Hummel [print or type full name], declare under penalty of perjury that I have read in its entirety and understand the Confidentiality Order that was issued by the United States District Court for the Southern District of Texas on August __, 2019 in the case of *M.D. et al. v. Abbott, et al.*, No. 2:11-cv-00084. I agree to comply with and to be bound by all the terms of the Confidentiality Order, and I understand and acknowledge that failure to so comply could expose me to sanctions and punishment in the nature of contempt.
Date: February 7, 2024 5:55 PM EST

City and State where sworn and signed: Spring, TX

Printed name: Ashley Hummel

Signature: 
DocuSigned by:
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